

WEIL, GOTSHAL & MANGES LLP
Alfredo R. Pérez
700 Louisiana, Suite 1700
Houston TX 77002
Telephone: (713) 546 5000
Facsimile: (713) 224 9511

WEIL, GOTSHAL & MANGES LLP
Stephen A. Youngman
200 Crescent Court, Suite 300
Dallas, Texas 75201
Telephone: (214) 746-7758
Facsimile: (214) 746-7777

WEIL, GOTSHAL & MANGES LLP
Robert F. Carangelo (admitted *pro hac vice*)
Jodi L. Barrow (admitted *pro hac vice*)
Amanda K. Pooler (admitted *pro hac vice*)
767 Fifth Avenue
New York, New York 10153
Telephone: (212) 310-8000
Facsimile: (212) 310-8007

*Counsel for Defendant Joseph C. Magnacca and
Former Defendants Robert E. Abernathy, Frank
J. Belatti, Julie A. Dobson, Daniel R. Feehan, H.
Eugene Lockhart, Jack L. Messman, and Edwina
D. Woodbury*

QUINN EMANUEL URQUHART &
SULLIVAN, LLP
Susheel Kirpalani, Esq.
Robert S. Loigman, Esq.
Rex Lee, Esq.
51 Madison Avenue, 22nd Floor
New York, NY 10010
212-849-7000 Telephone
212-849-7100 Facsimile
susheelkirpalani@quinnemanuel.com
robertloigman@quinnemanuel.com
rexlee@quinnemanuel.com
Telephone: (212) 849-7000
Facsimile: (212) 849-7100

COLE SCHOTZ P.C.
Michael D. Warner, Esq. (TX Bar No. 00792304)
301 Commerce Street, Suite 1700
Telephone: 817-810-5250
Facsimile: 817-810-5255
mwarner@coleschotz.com

Counsel Plaintiff RSH Liquidating Trust

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION**

RSH Liquidating Trust,	§	
	§	
	§	
Plaintiff,	§	Adversary No.: 15-04076-rfn
	§	
-against-	§	
	§	
Joseph C. Magnacca, Robert E. Abernathy,	§	
Frank J. Belatti, Julie A. Dobson, Daniel R.	§	
Feehan, H. Eugene Lockhardt, Jack L.	§	
Messman, and Edwina D. Woodbury,	§	
Defendants.		

**STIPULATION EXTENDING ANSWER DATE
AND DATE TO EXCHANGE INITIAL DISCLOSURES**

Plaintiff, the RSH Liquidating Trust (the “Trust”), by its attorneys Cole Schotz, P.C. and Quinn Emanuel Urquhart & Sullivan, LLP, together with Defendant Joseph C. Magnacca (“Mr. Magnacca”) and Former Defendants Robert E. Abernathy, Frank J. Belatti, Julie A. Dobson, Daniel R. Feehan, H. Eugene Lockhardt, Jack L. Messman, and Edwina D. Woodbury (collectively, with Mr. Magnacca, the “Defendants”), by their attorneys Weil Gotshal & Manges LLP, hereby submit this Stipulation Extending the date by which Mr. Magnacca shall answer the Amended Complaint, and the Trust and Mr. Magnacca shall exchange initial disclosures.

WHEREAS on October 29, 2015, the Trust filed an Amended Complaint in the above captioned action (Docket No. 8);

WHEREAS on November 11, 2015, the Trust and Defendants (collectively, the “Parties”) filed a *Jointly Submitted Case Status Report* (DI. 17) which included a discovery schedule;

WHEREAS the Trust and Mr. Magnacca have agreed to extend the date by which Mr. Magnacca must Answer the Amended Complaint to October 13, 2016, and the deadline to exchange initial disclosures to November 3, 2016;

IT IS HEREBY STIPULATED AND AGREED, by the Parties hereto that:

1. The deadline for Mr. Magnacca to file an Answer to the Amended Complaint is October 13, 2016; and
2. The deadline for the Trust and Mr. Magnacca to exchange initial disclosures is November 3, 2016.

Dated: August 11, 2016

/s/ Alfredo R. Pérez

Alfredo R. Pérez

Weil, Gotshal & Manges LLP

700 Louisiana, Suite 1700

Houston, Texas 77002

Telephone: (713) 546-5000

Facsimile: (713) 224-9511

Stephen A. Youngman

Weil, Gotshal & Manges LLP

200 Crescent Court, Suite 300

Dallas, Texas 75201

Telephone: (214) 746-7758

Facsimile: (214) 746-7777

Robert F. Carangelo (admitted *pro hac vice*)

Jodi L. Barrow (admitted *pro hac vice*)

Amanda K. Pooler (admitted *pro hac vice*)

Weil, Gotshal & Manges LLP

767 Fifth Avenue

New York, New York 10153

Telephone: (212) 310-8000

Facsimile: (212) 310-8007

Counsel for Defendant Joseph C. Magnacca and Former Defendants Robert E. Abernathy, Frank J. Belatti, Julie A. Dobson, Daniel R. Feehan, H. Eugene Lockhart, Jack L. Messman, and Edwina D. Woodbury

And

/s/ Michael D. Warner

Michael D. Warner, Esq. (TX Bar No. 00792304)

Cole Schotz P.C.

301 Commerce Street, Suite 1700

Fort Worth, Texas 76102

Telephone: 817-810-5250

Facsimile: 817-810-5255

mwarner@coleschotz.com

Susheel Kirpalani, Esq. (admitted *pro hac vice*)

Robert S. Loigman, Esq. (admitted *pro hac vice*)

Rex Lee, Esq. (admitted *pro hac vice*)

**Quinn Emanuel Urquhart
& Sullivan, LLP**

51 Madison Avenue, 22nd Floor

New York, NY 10010

Telephone: 212-849-7000

Facsimile: 212-849-7100

susheelkirpalani@quinnemanuel.com

robertloigman@quinnemanuel.com

rexlee@quinnemanuel.com

Attorneys for Plaintiff RSH Liquidating Trust